

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MARY A. KELLY and THOMAS M. KELLY,)	
)	
Plaintiffs)	
)	
v.)	No. 19 cv 5328
)	
CITIMORTGAGE, INC. and)	The Honorable Gary Feinerman
CENLAR FSB d/b/a Central Loan Administration &)	
Reporting, a federally chartered savings bank,)	
)	
Defendants)	

**AGREED MOTION FOR EXTENSION OF TIME TO RESPOND
TO PLAINTIFFS' COMPLAINT AND TO RESCHEDULE STATUS HEARING**

Pursuant to Federal Rule of Civil Procedure 6(b), Defendants CitiMortgage, Inc. ("CMI") and Cenlar FSB d/b/a Central Loan Administration & Reporting ("Cenlar"), hereby move for an order granting them a 30-day extension of time to answer or otherwise plead in response to Plaintiffs' Complaint. In support of this motion, Defendants state as follows:

1. Plaintiffs Mary and Thomas Kelly filed their Complaint on August 7, 2019. Dkt. No. 1.
2. CMI and Cenlar were served with the Complaint and subsequently moved for an extension of time for their respective responsive pleadings. Dkts. No. 5-6, 8.
3. This Court granted Defendants' motion, set the response deadline for October 3, 2019, and set an initial status hearing for October 7, 2019. Dkt. No. 11.
4. However, the Defendants require additional time to gather information and investigate the allegations in the Kellys' Complaint.
5. Moreover, the parties have been engaged in settlement discussions. The Kellys have made a settlement demand, which the Defendants are in the process of evaluating.

6. Accordingly, and in a good faith effort to attempt to conserve the parties' and the Courts' resources, and resolve this matter without the need for further litigation, Cenlar and CMI seek an extension of time for their response to the Complaint.

7. This is the Defendants' second request for an extension.

8. This request is not for purposes of delay. The undersigned counsel has conferred with counsel for the Kellys, and counsel for the Kellys agrees to this extension.

WHEREFORE, for the foregoing reasons, Defendants CitiMortgage, Inc. and Cenlar FSB request that the Court extend the time for Defendants' responsive pleading to the Complaint to November 4, 2019, re-set the October 7, 2019 initial status hearing, and grant such further relief as the Court deems just and proper.

Dated: September 30, 2019

Respectfully submitted,

CITIMORTGAGE, INC. and
CENLAR FSB

By: /s/ Irina Dashevsky
One of Their Attorneys

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CERTIFICATE OF SERVICE

The undersigned attorney certifies that on September 30, 2019, she caused the foregoing Agreed Motion for Extension of Time to Respond to Plaintiffs' Complaint and to Reschedule Status Hearing to be served by electronically filing with the Clerk of the Court for the Northern District of Illinois using the CM/ECF system, and thereby serving by e-mail notification upon counsel for all parties of record.

/s/ Irina Dashevsky